



Maryland

Department of the Environment

Wes Moore, Governor
Aruna Miller, Lt. Governor

Serena McIlwain, Secretary
Suzanne E. Dorsey, Deputy Secretary
Adam Ortiz, Deputy Secretary

May 1, 2025

Mr. Khalil Zaied, Director
Baltimore City Department of Public Works
200 N. Holliday Street, 6th Floor
Baltimore, MD 21202

Dear Mr. Zaied:

This letter acknowledges the Maryland Department of the Environment's (Department) receipt of Baltimore City's 2024 Financial Assurance Plan (FAP), and 2024 Watershed Protection and Restoration Program (WPRP) Annual Report as required by the Annotated Code of Maryland. This FAP submission includes information on the cost of compliance with the impervious surface restoration plan (ISRP) requirements outlined in the City's National Pollutant Discharge Elimination System (NPDES) Phase I Municipal Separate Storm Sewer System (MS4) permit.

The ISRP, when sufficiently funded, is essential for restoring local water quality and the Chesapeake Bay, and providing climate resiliency in the City's watersheds. The FAPs are sufficient if they demonstrate that the City has the dedicated revenues, funds, or sources of funds to meet, for the 2-year period immediately following the filing date of the FAP, 100% of the projected costs of compliance with the ISRP requirements of the City's MS4 permit.

After reviewing the City's 2024 FAP, the Department has determined that the City has demonstrated that it has sufficient funding in its FAP. This determination is contingent upon a public hearing and official approval by the local governing body. The Department has provided more detailed comments in an attachment for the City's information and use. The City's next WPRP Annual Report will be due in coordination with its next MS4 Annual Report, and its FAP will be due in coordination with the 2026 MS4 Annual Report.

The Department recognizes the substantial effort required in developing these FAPs and WPRP Annual Reports, and looks forward to working with the City on this very important environmental program for improving water quality, stormwater management, and climate resiliency. If you have any questions regarding this review, please contact me at 410-537-3567 or Jennifer M. Smith at 410-537-3561, or jenniferm.smith@maryland.gov.

Sincerely,

D. Lee Currey
Director, Water and Science Administration

cc: Jennifer M. Smith, P.E., Program Manager, Stormwater, Dam Safety, and Flood Management Program
Kimberly Grove, Chief, Office of Research and Environmental Protection, Baltimore City

Attachment

Review of Baltimore City's 2024 Financial Assurance Plan (FAP)

Plan Condition	Assessment and Recommendations
Demonstration of Sufficient Funding	<ul style="list-style-type: none"> Baltimore City (City) submitted its draft FAP on February 18, 2025, and a revised FAP was submitted on February 20, 2025. The FAP demonstrated sufficient funding for the projected Impervious Surface Restoration Plan (ISRP) costs for the next two-year period (i.e., FY2025-FY2026). This determination is contingent upon a public hearing and official approval of the FAP by the local governing body.
Actions to Meet Permit Requirements	<ul style="list-style-type: none"> The plan included an Executive Summary. The “All Actions” worksheet included best management practices (BMPs) and associated costs for FY2025 to FY2031. For the next two years (FY2025-FY2026), the City plans to complete 2,632 acres of new restoration. Additionally, the City will maintain 5,701 acres of operational BMPs established in the previous permit.
Annual and Projected Costs	<ul style="list-style-type: none"> The “All Actions - Planned” worksheet indicated that projected cost for new restoration to be implemented over the next two fiscal years (FY2025-FY2026) is \$25.1 million (M). The City reported projected two-year costs for maintaining operational BMPs established during the previous permit is \$0, but costs were reported for previous fiscal years. Please ensure all costs are reported. In the “ISRP Costs” worksheet, costs were reported through FY2029, and the cost for the next two years is \$99.1M.
Annual and Projected Revenues	<ul style="list-style-type: none"> The “ISRP Revenue” worksheet included projected revenues through FY2029. Reported revenue for FY2025 and FY2026 (\$99.1M) is equal to the projected ISRP costs (\$99.1M). The City indicated that \$31.4M of the \$99.1M of revenue reported consists of appropriations for capital projects approved by 2023, but is scheduled for expenditure within the next two years.
Funding Sources	<ul style="list-style-type: none"> In the “Fund Sources” worksheet, fund sources were projected through FY2029. Sources of funds for the next two years include: <ul style="list-style-type: none"> Stormwater Remediation Fee (Watershed Protection and Restoration Fund, or WPRF) = \$53.6M Water/Wastewater Utility = \$3.2M Miscellaneous Fees (WPRF) = \$1.2M State Grants = \$0.005M Total Funding Sources = \$57.9M
Specific Actions and Expenditures from Previous Fiscal Years	<ul style="list-style-type: none"> The “Specific Actions – Completed” worksheet included FY2022 to FY2024 BMPs and expenditures for 1,453 acres of new restoration and 5,095 acres of maintained operational BMPs established in the previous permit.